



**U.S. Department of Justice**

*United States Attorney  
District of New Jersey*

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*Elisa T. Wiygul  
Assistant United States Attorney*

*401 Market Street, 4<sup>th</sup> Floor  
Camden, New Jersey 08101*

*(856) 968-4929*

August 15, 2022

**VIA ECF AND E-MAIL**

The Honorable Sharon A. King  
United States Magistrate Judge  
United States District Court for the District of New Jersey  
Mitchell H. Cohen Building & U.S. Courthouse  
4<sup>th</sup> & Cooper Streets  
Camden, New Jersey 08101

Re: *United States v. Anthony Barbarino*,  
Mag. No. 22-17051 (SAK)

Dear Judge King:

I am writing to inform you that, subsequent to the signing of the complaint in the above matter, the undersigned learned the following information: While the search of defendant Anthony Barbarino's residence was ongoing but before he had been arrested, law enforcement told Barbarino, in substance and in part, that he had to unlock his electronic devices and provide their passwords. Barbarino did so for a cellular telephone and a desktop computer.

Information gleaned from an onsite review of the desktop computer was thereafter included in the affidavit of probable cause in support of the complaint in this matter. Specifically, the last sentence of paragraph 7 of the complaint read: "Based on a preliminary forensic examination of the Computer, Windows lists the registered owner of the Computer as an e-mail address that includes the full name Anthony J. Barbarino."

Regardless of whether this information could have been obtained in a manner that did not require the password, the Government respectfully submits that there would have been probable cause to charge the defendant even if the complaint had not included this statement. The Government stands

ready to sign an Amended Complaint excising this information, should the Court wish to do so.

Thank you for Your Honor's consideration.

Respectfully submitted,

PHILIP R. SELLINGER  
United States Attorney

/s/ Elisa T. Wiygul

By: Elisa T. Wiygul  
Assistant United States Attorney

cc: Lori Koch, Esq.